



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

144885

REPLY TO THE ATTENTION OF:

SR-6J

NOV 14 1997

RECEIVED
NOV 20 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

**SUPERFUND PROGRAM
MANAGEMENT BRANCH**

Clayton Chemical Company
Richard E. Lee, Pres.
One Mobile Street
Sauget, IL 62201-1069

RE: Demand for reimbursement of costs expended at Site Q of the
Area 2 Sauget Superfund Site at Sauget, Illinois

Dear Sir:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants, or contaminants at the above-referenced Site. The U.S. EPA believes that your company is responsible for costs incurred by the U.S. EPA at this Superfund Site.

U.S. EPA and the State of Illinois EPA have taken action at the Site, under the authority of the Superfund Program. Your company is responsible for reimbursing the U.S. EPA for the response costs associated with the 1995 removal action, conducted to reduce any immediate threat to the environment or human health. The approximate total response costs identified through October 16, 1997 for the Site are \$170,652.85. A summary of these costs is enclosed. (See Attachment A.)

According to Section 107(a) of CERCLA, Potentially Responsible Parties (PRPs) are jointly and severally liable for all costs incurred by U.S. EPA at a Superfund site, meaning any one party may be liable for all site costs. To assist the PRPs in negotiating with U.S. EPA concerning this matter, attached to

this letter is a list of names and addresses of other PRPs to whom this demand for reimbursement is being sent. (See Attachment B.) It should be noted that inclusion on or exclusion from the list does not constitute a final determination by U.S. EPA concerning the liability of any party for payment of response costs. Usually, partial payments will not release the payor of liability for payment of the rest of the costs that are owed to U.S. EPA.

We hereby demand that you make restitution by payment in the amount of \$170,652.85. Pursuant to Section 107(a) of CERCLA, interest shall begin accruing as of the date of this demand, if payment is not received within thirty (30) days of the date of this letter.

Such payment must be made to the U.S. EPA Hazardous Substances Superfund established pursuant to Section 221 of CERCLA, which is administered by U.S. EPA. Please send your check to:

U.S. EPA - Region V
Attn: Superfund Accounting
P.O. Box 70753
Chicago, Illinois 60673

Please place the following Site Identification Number on the check: **XX**. Please, also, send a copy of your payment check to Leslie A. Kirby in the Office of Regional Counsel at the following address:

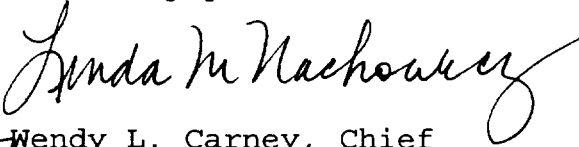
U.S. EPA - Region V
77 W. Jackson Boulevard C-29A
Chicago, IL 60604


If a response from you is not received within thirty days (30), the U.S. EPA will assume that you have declined to reimburse the Superfund for the Site expenditures, and pursuant to CERCLA, U.S. EPA may pursue civil litigation to recover its costs.

If you desire to discuss your liability with U.S. EPA, please contact Leslie A. Kirby, Assistant Regional Counsel, within thirty days (30) of the date of this letter at (312)886-7166. Leah Evison is the assigned Remedial Project

Manager to the Sauget Site Q matter, and may be reached by phone at (312) 886-4696; her facsimile number is (312) 886-4071.

Sincerely yours,

A handwritten signature in cursive script, reading "Linda M. Nachowicz".

 Wendy L. Carney, Chief
Remedial Response Branch #1

Enclosures

cc: Illinois Environmental Protection Agency

ATTACHMENT A

ITEMIZED COST SUMMARY
SAUGET AREA 2 (SITE Q), IL
SUPERFUND SITE # XX
PREPARED 10/16/97

EPA EXPENDITURES		Cumulative Costs Through September 30, 1997
EPA PAYROLL --		
--Headquarters	\$	124.81
--Regional		8,737.15
INDIRECT COST --		
--		22,119.50
EPA TRAVEL --		
--Headquarters		0.00
--Regional		1,203.94
ERCS CONTRACT --		
--Riedel Environmental Services (55-S2-5001)		138,467.45
TOTAL EPA COSTS BEFORE INTEREST	\$	170,652.85
TOTAL COSTS RECOVERED TO DATE		0.00
TOTAL EPA COSTS FOR SAUGET AREA 2 (SITE Q)	\$	170,652.85
Prejudgment Interest		0.00
TOTAL EPA UNRECOVERED COSTS FOR SAUGET AREA 2 (SITE Q), IL	\$	<u>170,652.85</u>

Please Note:

National Contract Laboratory program costs may be significantly understated. These costs do not include any lab costs that may have been billed to EPA prior to FY 1986, if such costs were incurred, and no estimate of the CLP Sample Management Cost (ranges from 6.1 % to 17.0 % of Analytical costs) is provided. A complete accounting of Contract Laboratory Costs normally is provided by VIAR within the documentation process.

This summary does not include Department of Justice costs. Those costs will be documented separately by the Department of Justice.

ATTACHMENT B

Parties Receiving Demand Letter

Browning Ferris Industries, Inc.
Gerald K. Burger, V.P. - Secretary
P.O. Box 3151
Houston, TX 77253

Browning Ferris Industries of St. Louis, Inc.
11506 Bowling Green
Creve Coeur, MO 63141

Cahokia Trust

*Donald Elsaesser, Trustee 1718 Warson Estates Drive St. Louis, MO 63124	*Robert H. McRoberts, Trustee Bryan, Cave, McPheeters & McRoberts 500 North Broadway St. Louis, MO 63102-2186
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***Russell P. Richardson, Trustee**
400 Southwind Drive
Belleville, IL 62221

Clayton Chemical Company
Richard E. Lee, Pres.
1 Mobile St.
Sauget, IL 62201-1069

Crown Cork & Seal Co., Inc.
9300 Ashton Road
P.O. Box 6208
Philadelphia, PA 19136

Dennis Chemical Co., Inc.
Aaron Dennis, President
2700 Papin St.
St. Louis, MO 63102-3042

Eagle Marine Industries, Inc.
2701 North Geyer Road
St. Louis, MO 63131

Ethyl Petroleum Additives, Inc.
501 Monsanto Avenue
East St. Louis, IL 62206-1138

Appendix B- Page 2

Inmont Corporation
c/o BASF Corporation
8 Campus Drive
Parsippany, NJ 07054

Monsanto Company
ATTN: D. Michael Light
800 North Lindbergh Avenue
St. Louis, MO 63167

Pillsbury Co.
Jerome J. Jenko, General Counsel
Pillsbury Center
Minneapolis, MN 55402

Riverport Terminal & Fleeting Co.
Suite 1725
200 North Broadway
St. Louis, MO 63102-2716

Paul Sauget
Sauget & Co.
2700 Monsanto Avenue
Sauget, IL 62206

Union Electric
W.E. Jaudès, General Counsel
P.O. Box 149
St. Louis, MO 63166

United States
Environmental Protection Agency

Region 5
77 West Jackson Blvd.
Chicago IL 60604-3590

Official Business
Penalty for Private Use, \$300

SM-5J

Fold at line over top of envelope to
the right of the return address

CERTIFIED

Z 061 994 309

MAIL

RECEIVED
NOV 20 1997

SUPERFUND PROGRAM
MANAGEMENT BRANCH

Clayton Chemical Company
Richard E. Lee, Pres.
One Mobile Street
Chicago IL 62201-1069

RETURN TO SENDER
FWD ORDER EXP. _____
NO SUCH NUMBER _____
MOVED NO ORDER _____
VACANT _____
DATE _____
ATTEMPTED NOT KNOWN _____
INSUFFICIENT ADDRESS _____
DECEASED _____
REFUSED _____
ROUTE # _____ CAR INT _____

is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Clayton Chemical Company
Richard E. Lee, Pres.
One Mobile Street
Sauget, IL 62201-1069

4a. Article Number

Z 061 994 309

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X

Thank you for using Return Receipt Service.